

Exhibit A

Andrew Belli

From: Packman, Stephen M. <spackman@archerlaw.com>
Sent: Friday, July 7, 2023 10:53 AM
To: Andrew Belli
Cc: Steven Coren; (mah@hangley.com)
Subject: RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

EXTERNAL EMAIL.

Andrew, I hope you and Steve are doing well. The request for an extension to respond to the Complaint is made by Matthew on behalf of all defendants. We are currently working out the defense representations since you have joined so many parties as defendants and should be in a position to let you know the breakdown by next week. We will send you a stipulation on the extension if you think that is necessary. As far as Plaintiff's conditions ("caveats") below, they are acceptable to the defendants.

Stephen M. Packman, Esq.

Fellow of INSOL

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From: Andrew Belli <ABelli@kcr-law.com>
Sent: Friday, July 7, 2023 8:54 AM
To: Hamermesh, Matthew A. <mah@hangley.com>; Packman, Stephen M. <spackman@archerlaw.com>
Cc: Steven Coren <SCoren@kcr-law.com>
Subject: [EXT MAIL] RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

Matt –

Responding to your 7/6 email to Steve Coren. Is the request to extend deadlines truly on behalf of all defendants? Who is representing which defendant(s)?

We are amenable to your extension request with the following caveats: 1) Plaintiff receives a commensurate extension to respond to any Rule 12 motions which may be filed (original deadline plus 30 days); 2) we will not agree to extend the deadline for any motions alleging insufficient service of process.

Best,

Andy

Andrew J. Belli, Esquire
(215) 735-8700 (Phone)

From: Andrew Belli
Sent: Friday, May 19, 2023 11:18 AM
To: Hamermesh, Matthew A. <mah@hangley.com>
Subject: RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

Following up here.

Andrew J. Belli, Esquire
(215) 735-8700 (Phone)

From: Andrew Belli
Sent: Monday, May 8, 2023 9:06 AM
To: Hamermesh, Matthew A. <mah@hangley.com>
Subject: RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

Matt following up on how the modified request is overbroad? It is limited to two custodians, then further limited to specific recipients, for a time frame that is directly targeted to reveal information relevant to the Debtor. It is incredibly limited and easy to effectuate.

Andrew J. Belli, Esquire
(215) 735-8700 (Phone)

From: Andrew Belli
Sent: Thursday, May 4, 2023 5:35 PM
To: Hamermesh, Matthew A. <mah@hangley.com>
Subject: Re: Midnight Madness, LLC [IWOV-HASP1.FID137704]

How is it overbroad?

On May 4, 2023, at 5:22 PM, Hamermesh, Matthew A. <mah@hangley.com> wrote:

EXTERNAL EMAIL.

Andy:

My apologies for my delay in getting back to you. I have discussed this with my clients. While we appreciate your efforts to narrow the request, this is still covers vastly more territory than what the trustee might legitimately have an interest in reviewing. We cannot agree to this overbroad request.

Matt

Matthew A. Hamermesh
Hangley Aronchick Segal Pudlin & Schiller
(215) 496-7054 (office)
(267) 240-3893 (mobile)
mhamermesh@hangley.com



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From: Andrew Belli <ABelli@kcr-law.com>
Sent: Tuesday, May 2, 2023 12:43 PM
To: Hamermesh, Matthew A. <mah@hangley.com>
Subject: RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

Matt, any word here?

Andrew J. Belli, Esquire
(215) 735-8700 (Phone)

From: Andrew Belli
Sent: Friday, April 28, 2023 11:36 AM
To: Hamermesh, Matthew A. <mah@hangley.com>
Subject: RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

Hi, Matt – hope all is well. Following up here.

Andrew J. Belli, Esquire
(215) 735-8700 (Phone)

From: Andrew Belli
Sent: Tuesday, April 25, 2023 1:34 PM
To: Hamermesh, Matthew A. <mah@hangley.com>
Subject: RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

Matt, my apologies for the delay, I have been thinking about the best mutually agreeable way to simplify these requests for you. What do you think about compromising by distilling things down to the following single request: all communications (in whatever form and regardless of what entity they purport to be on behalf of) between or among Shawn Sheehan and Ryan Uszenski, on the one hand, and Sheehan, Uszenski, Casey Parzych, Kelly Festa, Gary Parzych, Angus Rittenburg, Ashleigh Baldwin, and John Pitts, on the other hand, between 1/1/2021 and 12/31/2022.

Public records indicate that Mr. Sheehan owns and controls both your clients and is the President of XO Energy MA, Inc., the ultimate owner of Best Bev, LLC, an entity which is in the same exact business as, employs a large number of the same employees as, and appears to have improperly usurped the assets of the Debtor. Best Bev is co-managed by your client EtOH Worldwide, LLC and Mr. Uszenski.

If this isn't acceptable we will proceed with the original requests as worded, with the following limitations to address the concerns you raised during our telephone conversation:

1. Timeframe on all requests limited to 1/1/2020 to the present;
2. Request 9 limited to communications relating to the subject matter of relating to the ethanol, copackaging and/or beverage industries, including, but not limited to, entity

formation, site leasing/construction, storage, formulation, production, canning, packaging, co-packing, labeling, sourcing, marketing, staffing, and/or sale of ethanol products (including, but not limited to liquor, alcoholic beverages, hand sanitizer, and raw ethanol) and/or beverages (including, but not limited to, alcoholic beverages and/or beverages containing CBD and/or THC).

Please let me know your thoughts.

Best,

Andy

Andrew J. Belli, Esquire
(215) 735-8700 (Phone)

From: Hamermesh, Matthew A. <mah@hangley.com>
Sent: Tuesday, April 18, 2023 10:25 AM
To: Andrew Belli <ABelli@kcr-law.com>
Subject: RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

EXTERNAL EMAIL.

Talk to you then.

Matt

Matthew A. Hamermesh
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(267) 240-3893 (mobile)
mhamermesh@hangley.com

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From: Andrew Belli <ABelli@kcr-law.com>
Sent: Tuesday, April 18, 2023 10:22 AM
To: Hamermesh, Matthew A. <mah@hangley.com>
Subject: RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

Yes.

Andrew J. Belli, Esquire
(215) 735-8700 (Phone)

From: Hamermesh, Matthew A. <mah@hangley.com>
Sent: Tuesday, April 18, 2023 10:11 AM

To: Andrew Belli <ABelli@kcr-law.com>
Subject: RE: Midnight Madness, LLC [IWOV-HASP1.FID137704]

EXTERNAL EMAIL.

Aaron:

I could talk at 3:30 on Wednesday. Does that work for you?

Matt

Matthew A. Hamermesh
Hangley Aronchick Segal Pudlin & Schiller
(215) 496-7054 (office)
(267) 240-3893 (mobile)
mhamermesh@hangley.com



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From: Andrew Belli <ABelli@kcr-law.com>
Sent: Saturday, April 15, 2023 7:10 AM
To: Hamermesh, Matthew A. <mah@hangley.com>
Subject: Re: Midnight Madness, LLC [IWOV-HASP1.FID137704]

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

I can make anytime Wednesday work, thanks.

On Apr 14, 2023, at 5:33 PM, Hamermesh, Matthew A. <mah@hangley.com>
wrote:

EXTERNAL EMAIL.

Andrew:

I am tied up with several matters Monday and Tuesday next week. Is there a good time we could talk later in the week?

Matt

Matthew A. Hamermesh
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From: Andrew Belli <ABelli@kcr-law.com>
Sent: Wednesday, April 5, 2023 3:23 PM
To: Hamermesh, Matthew A. <mah@hangley.com>
Subject: Midnight Madness, LLC

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

Mr. Hamermesh –

Please see the attached correspondence.

Best,

Andy

Andrew J. Belli, Esquire
Coren & Ress, P.C.
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